



February 7, 2011

Gerald Thompson  
Environmental Assistant  
Alaskan Copper Works  
3200 Sixth Avenue South  
Seattle, Washington 98124

Dear Mr. Thompson:

In accordance with the requirements of the Washington State Department of Ecology, World Resources Company (WRC) is happy to provide you with the following information needed to determine the exact amount of Alaskan Copper Works material recycled by WRC during the 2010 calendar year.

WRC is aware that the State of Washington requires a copy of the recycling credit documentation. In the past, Ms. Holly Sullivan at the Department of Ecology has been receptive to a copy of this letter as sufficient proof of recycling credit documentation.

The following information is provided for use in your submittal:

Total Wet Tons Received:	4.58
Average Percent Solids:	28.37
Total Dry Tons:	1.3
Total Percentage Recycled:	100% less 71.63% moisture

After consultation with WRC corporate, technical, and legal personnel, it appears that the Form Code of W501 (if lime or hydroxide is used to precipitate your metals) or W519 (other inorganic sludges) might be appropriate choices to be used in preparing your submission. These codes are from the Washington Department of Ecology Book 2 Guidebook and Codes. Additionally, the Management Method Code of H010 (metals recovery including retorting, smelting, etc.) for January 2010, and H039 (other treatment) for February through December 2010, would be applicable to WRC's recycling process.

Please be advised that in accordance with 40 CFR 262.11, the ultimate decision as to the classification of the hazardous waste (e.g., the Form Code) rests with the generator. The views expressed by WRC herein, should not be considered as legal advice or substituted for the more accurate generator's technical knowledge or laboratory analysis of the recyclable material and the generation process used.

If you have any questions regarding this information, please contact me at (602) 233-9166, ext. 2309.

Sincerely,

**WORLD RESOURCES COMPANY**

  
Gary Perillo  
Manager, Marketing and Business Development

